

Mr. Jeffrey R. Hipple  
South Bend Acquisition Corporation  
220 W. Eckman Street  
South Bend, IN 46601

Re: 141-11175  
First Significant Permit Modification to  
Part 70 No.: T141-6210-00010

Dear Mr. Hipple:

South Bend Acquisition Corporation was issued a permit on February 18, 1999 for a gray and ductile iron foundry. An appeal was filed on March 8, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the wording of the requirements to have preventive maintenance plans and changes in the wording of the stack test conditions. The conditions concerning scrubber failure now include language concerning operation in the event of an emergency. Also, the requirements to devise response steps within eight hours of baghouse or scrubber failure have been removed from the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nisha Sizemore, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nisha Sizemore or extension (2-8356), or dial (317) 232-8356.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

nls

cc: File - St. Joseph County  
U.S. EPA, Region V  
St. Joseph County Health Department  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT  
and St. Joseph County Health Department**

**South Bend Acquisition Corporation  
220 W. Eckman Street  
South Bend, Indiana 46601**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T141-6210-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 18, 1999
First Significant Modification 141-11175-00010	Pages Affected: 3-6, 15, 34, and 36-59
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]
- C.14 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Scrap and Charge Handling Process**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.2 FACILITY OPERATION CONDITIONS - Furnaces**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.3 FACILITY OPERATION CONDITIONS - pouring/casting**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.4 FACILITY OPERATION CONDITIONS - cooling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.5 FACILITY OPERATION CONDITIONS - Herman and Slinger shakeout**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.5.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.5.5 Visible Emissions Notations

D.5.6 Parametric Monitoring

D.5.7 Scrubber Inspections

D.5.8 Scrubber Failure

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.5.9 Record Keeping Requirements

**D.6 FACILITY OPERATION CONDITIONS - Pinlift shakeout**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.6.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

**Compliance Determination Requirements**

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.4 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.6.5 Record Keeping Requirements

D.6.6 Reporting Requirements

**D.7 FACILITY OPERATION CONDITIONS - Tumbleblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.7.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.7.5 Visible Emissions Notations

D.7.6 Parametric Monitoring

D.7.7 Baghouse Inspections

D.7.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.7.9 Record Keeping Requirements

**D.8 FACILITY OPERATION CONDITIONS - Tableblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.8.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.8.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.8.5 Visible Emissions Notations
- D.8.6 Parametric Monitoring
- D.8.7 Baghouse Inspections
- D.8.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.8.9 Record Keeping Requirements

**D.9 FACILITY OPERATION CONDITIONS - Spinnerblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]
- D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.9.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.9.5 Visible Emissions Notations
- D.9.6 Parametric Monitoring
- D.9.7 Baghouse Inspections
- D.9.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.9.9 Record Keeping Requirements

**D.10 FACILITY OPERATION CONDITIONS - Muller Sand Handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.10.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]
- D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.10.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.10.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.10.5 Visible Emissions Notations
- D.10.6 Scrubber Parametric Monitoring
- D.10.7 Scrubber Inspections
- D.10.8 Scrubber Failure

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.10.9 Record Keeping Requirements

**D.11 FACILITY OPERATION CONDITIONS - oil/shell core sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.11.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.11.3 Record Keeping Requirements

D.11.4 Reporting Requirements

**D.12 FACILITY OPERATION CONDITIONS - no-bake sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.12.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.12.3 Record Keeping Requirements

D.12.4 Reporting Requirements

**D.13 FACILITY OPERATION CONDITIONS - alphasert sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.13.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.13.3 Record Keeping Requirements

D.13.4 Reporting Requirements

**D.14 FACILITY OPERATION CONDITIONS - Magnesium treatment**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.14.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.15 FACILITY OPERATION CONDITIONS - Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.15.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

B.12 Preventive Maintenance Plan[326 IAC 2-7-5(1),(3)and(13)][326 IAC 2-7-6(1)and(6)][326 IAC1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and St. Joseph County Health Department upon request and shall be subject to review and approval by IDEM, OAM, and St. Joseph County Health Department. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and St. Joseph County Health Department representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Joseph County Health Department makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Health Department within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.



## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) scrap and charge handling process, constructed in 1977, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled;
- (b) one (1) scrap preheater, constructed in 1980, with a maximum heat input capacity of 2.17 million Btu per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the following conditions shall apply:

- (a) The PM emissions from the scrap and charge handling operation shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (b) The PM emissions from the scrap preheater shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) melting process, with a maximum capacity of 6 tons of iron per hour, uncontrolled, consisting of the following emission units;

- (1) one (1) electric induction furnace, constructed in September 1983, identified as unit 11A, with a maximum capacity of 1.5 tons of metal per hour, with emissions uncontrolled;
- (2) one (1) electric induction furnace, constructed in September 1983, identified as unit 11B, with a maximum capacity of 1.5 tons of metal per hour, with emissions uncontrolled; and
- (3) one (1) electric induction furnace, constructed in 1980, identified as unit 11C, with a maximum capacity of 3.0 tons of metal per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the three electric induction furnaces shall not exceed 0.07 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 36 months after the issuance of this permit, the Permittee shall perform PM testing on each of the furnaces (or on a representative furnace as determined by the OAM during protocol review) using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) pouring/casting process, constructed prior to 1950, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the pouring/casting process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 48 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.3.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

## **SECTION D.4 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

one (1) castings cooling process, constructed prior to 1950, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the castings cooling process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### **Compliance Determination Requirements**

#### **D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.5 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) shakeout system, constructed in 1977, identified as unit 6A, utilized for servicing the Herman and Slinger mold lines, with a maximum capacity of 6 tons of iron per hour and 30 tons of sand per hour, controlled by the north cyclone and a wet scrubber identified as CE-1A.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the Herman and Slinger shakeout system (unit 6A) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the north cyclone and wet scrubber CE-1A controlling this facility.

### Compliance Determination Requirements

#### D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.5.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.5.4 Particulate Matter (PM)

The wet scrubber CE-1A for PM control shall be in operation at all times when the Herman and Slinger castings shakeout process (unit 6A) is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the wet scrubber CE-1A stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.5.6 Parametric Monitoring

The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 4 to 9.5 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rates shall be maintained at a minimum of 75 gallons per minute or a minimum flow rate established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop or flow rate readings are outside of the normal ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.5.7 Scrubber Inspections

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An inspection shall be performed each calendar quarter of the scrubber CE-1A controlling the Herman and Slinger castings shakeout process (unit 6A) when venting to the atmosphere. All defective scrubber parts shall be replaced.

#### D.5.8 Scrubber Failure

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In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.5.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of daily visible emission notations of the scrubber stack exhaust.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the pressure drop readings and flow rate readings of the scrubber.
- (c) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7 and the types and numbers of any parts replaced.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) shakeout system, constructed in 1983, identified as unit 9A, utilized for servicing the Pinlift mold line, with a maximum capacity of 5 tons of iron per hour and 16 tons of sand per hour, with emissions uncontrolled;

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) from the Pinlift shakeout system (unit 9A) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.6.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable the metal throughput to the Pinlift shakeout system (unit 9A) shall not exceed 39,998 tons per 12 consecutive month period. Therefore the requirements of 326 IAC 8-1-6 (BACT) shall not apply.

### Compliance Determination Requirements

#### D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.6.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.6.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Pinlift shakeout system (unit 9A) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.6.5 Record Keeping Requirements

- (a) In order to document compliance with Condition D.6.4, the Permittee shall maintain records of daily visible emission notations of the control device stack exhaust.
- (b) In order to document compliance with Condition D.6.2, the Permittee shall maintain records of the metal throughput to the Pinlift shakeout system (unit 9A).

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.6.6 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.6.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.



## SECTION D.7

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Tumbleblast shotblaster, constructed in November, 1965, identified as unit 3, with a maximum capacity of 12.5 tons of iron castings per hour, using a 6300 acfm baghouse identified as CE-4 as emissions control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Tumbleblast shotblaster shall not exceed 0.030 grains per dry standard cubic foot of exhaust air and 5.0 tons per year.

#### D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-4 controlling this facility.

### Compliance Determination Requirements

#### D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Tumbleblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.7.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.7.4 Particulate Matter (PM)

The baghouse CE-4 for PM control shall be in operation at all times when the Tumbleblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.7.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-4 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.7.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-4 used in conjunction with the Tumbleblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure

drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### **D.7.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the Tumbleblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.7.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.7.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-4 stack exhaust.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections required under Condition D.7.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.8 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Tableblast shotblaster, constructed in July, 1967, identified as unit 4, with a maximum capacity of 3.0 tons of iron castings per hour, using a 4500 acfm baghouse identified as CE-2 as control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.8.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Tableblast shotblaster shall not exceed 0.037 grains per dry standard cubic foot of exhaust air and 4.3 tons per year.

#### D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-2 controlling this facility.

### Compliance Determination Requirements

#### D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Tableblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.8.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.8.4 Particulate Matter (PM)

The baghouse CE-2 for PM control shall be in operation at all times when the Tableblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.8.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-2 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.8.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-2 used in conjunction with the Tableblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range

established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### **D.8.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the Tableblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.8.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.8.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.8.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-2 stack exhaust.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (e) To document compliance with Condition D.8.7, the Permittee shall maintain records of the results of the inspections required under Condition D.8.7 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.9 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Spinnerblast shotblaster, constructed in 1979, identified as unit 7, with a maximum capacity of 1.5 tons of iron castings per hour, using a 4500 acfm baghouse identified as CE-3 as control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Spinnerblast shotblaster shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-3 controlling this facility.

### Compliance Determination Requirements

#### D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Spinnerblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.9.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.9.4 Particulate Matter (PM)

The baghouse CE-3 for PM control shall be in operation at all times when the Spinnerblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.9.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-3 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.9.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-3 used in conjunction with the Spinnerblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain

troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.9.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Spinnerblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.9.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.9.9 Record Keeping Requirements

- (a) To document compliance with Condition D.9.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-3 stack exhaust.
- (b) To document compliance with Condition D.9.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (g) To document compliance with Condition D.9.7, the Permittee shall maintain records of the results of the inspections required under Condition D.9.7 and the dates the vents are redirected.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.10 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) muller green sand handling system, including two sand storage bins, each with a capacity of 150 tons, identified as unit 5, constructed in August 1976, with a maximum capacity of 60 tons of sand per hour, with emissions controlled by a wet scrubber, identified as CE-1B.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.10.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the muller green sand handling system shall not exceed 0.074 grains per dry standard cubic foot of exhaust air and 19.0 tons per year.

#### D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wet scrubber CE-1B controlling this facility.

### Compliance Determination Requirements

#### D.10.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.10.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.10.4 Particulate Matter (PM)

The wet scrubber CE-1B for PM control shall be in operation at all times when the muller green sand handling system is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.10.5 Visible Emissions Notations

- (a) Daily visible emission notations of the wet scrubber CE-1B stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.10.6 Scrubber Parametric Monitoring

The Permittee shall monitor and record the pressure drop and flow rate of the scrubber CE-1B, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 4 to 9.5 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rates shall be maintained at a minimum of 75 gallons per minute or minimum

flow rates established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop or flow rate readings are outside of the normal ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.10.7 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubber controlling the miller green sand handling system when venting to the atmosphere. All defective scrubber parts shall be replaced.

#### D.10.8 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.10.9 Record Keeping Requirements

- (a) To document compliance with Condition D.10.5, the Permittee shall maintain records of daily visible emission notations of the wet scrubber CE-1B stack exhausts.
- (b) To document compliance with Condition D.10.6, the Permittee shall maintain records of the pressure drop readings and flow rate readings of each of the scrubbers.
- (c) To document compliance with Condition D.10.7, the Permittee shall maintain records of the results of the inspections required under Condition D.10.7 and the types and numbers of any parts replaced.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## SECTION D.11

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) oil/shell core sand handling system, including two silos each with a capacity of 25 tons of sand, identified as unit 10A, constructed in 1977, with a maximum capacity of 2.11 tons of sand per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.11.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the oil/shell core sand handling system shall not exceed 0.052 grains per dry standard cubic foot of exhaust air and 5.0 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the oil/shell core sand handling system shall be limited to 2803.2 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.11.3 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain records of the sand throughput to the oil/shell core sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.11.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.12 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) no-bake sand handling system, identified as unit 10, located in the south yard, constructed prior to 1970, with a maximum capacity of 1.25 tons of sand per hour, with emissions uncontrolled, and consisting of the following emission units:

- (a) one (1) pneumatic air driven silo with a maximum capacity of 75 tons of sand; and
- (b) one (1) sand hopper with a maximum capacity of 15 tons of sand.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.12.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the no-bake sand handling system shall not exceed 0.027 grains per dry standard cubic foot of exhaust air and 14.6 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the no-bake sand handling system shall be limited to 8103 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.12.3 Record Keeping Requirements

- (a) To document compliance with Condition D.12.1, the Permittee shall maintain records of the sand throughput to the no-bake sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.12.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.12.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.13

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Alphaset sand handling system, including one silo with a capacity of 50 tons of sand and one (1) storage hopper with a capacity of 10 tons, identified as unit 10B, constructed in 1976, with a maximum capacity of 5.0 tons of sand per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.13.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the alphaset sand handling system shall not exceed 0.021 grains per dry standard cubic foot of exhaust air and 5.6 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the alphaset sand handling system shall be limited to 3109.8 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.13.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.13.3 Record Keeping Requirements

- (a) To document compliance with Condition D.13.1, the Permittee shall maintain records of the sand throughput to the alphaset sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.13.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.13.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.14 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

one (1) magnesium treatment process for producing ductile iron, identified as unit number 22, constructed in 1977, with a maximum capacity of 6.0 tons of iron per hour, with emissions controlled with the use of the Sigmat process. The Sigmat process is essentially a box enclosure which holds the magnesium. The iron is poured into the box to react with the magnesium and smoke is unable to escape.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.14.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the magnesium treatment process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### **D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the sigmat process controlling this facility.

### **Compliance Determination Requirements**

#### **D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.15 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities including the following:

- (a) six (6) snag grinders, constructed in 1970, identified as units 2A through 2D, using a 20,535 acfm baghouse identified as CE-5 for emissions control;
- (b) nine (9) portable grinders, constructed in 1960, identified as units 2E through 2K, with emissions uncontrolled; and
- (c) one (1) welding/grinding station, constructed in 1960, identified as unit 2L, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.15.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each of the above listed processes shall not exceed 0.023 grains per dry standard cubic foot of exhaust air and 3.0 tons per year.

### Compliance Determination Requirements

#### D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing if it is necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.15.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT  
and St. Joseph County Health Department**

**South Bend Acquisition Corporation  
220 W. Eckman Street  
South Bend, Indiana 46601**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T141-6210-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 18, 1999
First Significant Modification 141-11175-00010	Pages Affected: 3-6, 15, 34, and 36-59
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]
- C.14 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Scrap and Charge Handling Process**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.2 FACILITY OPERATION CONDITIONS - Furnaces**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.3 FACILITY OPERATION CONDITIONS - pouring/casting**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.4 FACILITY OPERATION CONDITIONS - cooling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

**Compliance Determination Requirements**

- D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.5 FACILITY OPERATION CONDITIONS - Herman and Slinger shakeout**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.5.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.5.5 Visible Emissions Notations

D.5.6 Parametric Monitoring

D.5.7 Scrubber Inspections

D.5.8 Scrubber Failure

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.5.9 Record Keeping Requirements

**D.6 FACILITY OPERATION CONDITIONS - Pinlift shakeout**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.6.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

**Compliance Determination Requirements**

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.4 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.6.5 Record Keeping Requirements

D.6.6 Reporting Requirements

**D.7 FACILITY OPERATION CONDITIONS - Tumbleblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.7.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.7.5 Visible Emissions Notations

D.7.6 Parametric Monitoring

D.7.7 Baghouse Inspections

D.7.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.7.9 Record Keeping Requirements

**D.8 FACILITY OPERATION CONDITIONS - Tableblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.8.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]



**Compliance Determination Requirements**

- D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.8.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.8.5 Visible Emissions Notations
- D.8.6 Parametric Monitoring
- D.8.7 Baghouse Inspections
- D.8.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.8.9 Record Keeping Requirements

**D.9 FACILITY OPERATION CONDITIONS - Spinnerblast**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]
- D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.9.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.9.5 Visible Emissions Notations
- D.9.6 Parametric Monitoring
- D.9.7 Baghouse Inspections
- D.9.8 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.9.9 Record Keeping Requirements

**D.10 FACILITY OPERATION CONDITIONS - Muller Sand Handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.10.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]
- D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.10.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.10.4 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.10.5 Visible Emissions Notations
- D.10.6 Scrubber Parametric Monitoring
- D.10.7 Scrubber Inspections
- D.10.8 Scrubber Failure

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.10.9 Record Keeping Requirements

**D.11 FACILITY OPERATION CONDITIONS - oil/shell core sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.11.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.11.3 Record Keeping Requirements

D.11.4 Reporting Requirements

**D.12 FACILITY OPERATION CONDITIONS - no-bake sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.12.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.12.3 Record Keeping Requirements

D.12.4 Reporting Requirements

**D.13 FACILITY OPERATION CONDITIONS - alphasert sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.13.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.13.3 Record Keeping Requirements

D.13.4 Reporting Requirements

**D.14 FACILITY OPERATION CONDITIONS - Magnesium treatment**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.14.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.15 FACILITY OPERATION CONDITIONS - Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.15.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

**Compliance Determination Requirements**

D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

B.12 Preventive Maintenance Plan[326 IAC 2-7-5(1),(3)and(13)][326 IAC 2-7-6(1)and(6)][326 IAC1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and St. Joseph County Health Department upon request and shall be subject to review and approval by IDEM, OAM, and St. Joseph County Health Department. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and St. Joseph County Health Department representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Joseph County Health Department makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Health Department within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) scrap and charge handling process, constructed in 1977, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled;
- (b) one (1) scrap preheater, constructed in 1980, with a maximum heat input capacity of 2.17 million Btu per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the following conditions shall apply:

- (a) The PM emissions from the scrap and charge handling operation shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (b) The PM emissions from the scrap preheater shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) melting process, with a maximum capacity of 6 tons of iron per hour, uncontrolled, consisting of the following emission units;

- (1) one (1) electric induction furnace, constructed in September 1983, identified as unit 11A, with a maximum capacity of 1.5 tons of metal per hour, with emissions uncontrolled;
- (2) one (1) electric induction furnace, constructed in September 1983, identified as unit 11B, with a maximum capacity of 1.5 tons of metal per hour, with emissions uncontrolled; and
- (3) one (1) electric induction furnace, constructed in 1980, identified as unit 11C, with a maximum capacity of 3.0 tons of metal per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the three electric induction furnaces shall not exceed 0.07 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 36 months after the issuance of this permit, the Permittee shall perform PM testing on each of the furnaces (or on a representative furnace as determined by the OAM during protocol review) using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) pouring/casting process, constructed prior to 1950, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the pouring/casting process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 48 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.3.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

## **SECTION D.4 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

one (1) castings cooling process, constructed prior to 1950, with a maximum capacity of 6 tons of iron per hour, with emissions uncontrolled.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.4.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from each of the castings cooling process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### **Compliance Determination Requirements**

#### **D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.



## SECTION D.5 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) shakeout system, constructed in 1977, identified as unit 6A, utilized for servicing the Herman and Slinger mold lines, with a maximum capacity of 6 tons of iron per hour and 30 tons of sand per hour, controlled by the north cyclone and a wet scrubber identified as CE-1A.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the Herman and Slinger shakeout system (unit 6A) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the north cyclone and wet scrubber CE-1A controlling this facility.

### Compliance Determination Requirements

#### D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.5.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.5.4 Particulate Matter (PM)

The wet scrubber CE-1A for PM control shall be in operation at all times when the Herman and Slinger castings shakeout process (unit 6A) is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the wet scrubber CE-1A stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.5.6 Parametric Monitoring

The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 4 to 9.5 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rates shall be maintained at a minimum of 75 gallons per minute or a minimum flow rate established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop or flow rate readings are outside of the normal ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.5.7 Scrubber Inspections

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An inspection shall be performed each calendar quarter of the scrubber CE-1A controlling the Herman and Slinger castings shakeout process (unit 6A) when venting to the atmosphere. All defective scrubber parts shall be replaced.

#### D.5.8 Scrubber Failure

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In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.5.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of daily visible emission notations of the scrubber stack exhaust.
- (b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the pressure drop readings and flow rate readings of the scrubber.
- (c) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7 and the types and numbers of any parts replaced.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) shakeout system, constructed in 1983, identified as unit 9A, utilized for servicing the Pinlift mold line, with a maximum capacity of 5 tons of iron per hour and 16 tons of sand per hour, with emissions uncontrolled;

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) from the Pinlift shakeout system (unit 9A) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.6.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable the metal throughput to the Pinlift shakeout system (unit 9A) shall not exceed 39,998 tons per 12 consecutive month period. Therefore the requirements of 326 IAC 8-1-6 (BACT) shall not apply.

### Compliance Determination Requirements

#### D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after the issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.6.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.6.4 Visible Emissions Notations

- (a) Daily visible emission notations of the Pinlift shakeout system (unit 9A) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.6.5 Record Keeping Requirements

- (a) In order to document compliance with Condition D.6.4, the Permittee shall maintain records of daily visible emission notations of the control device stack exhaust.
- (b) In order to document compliance with Condition D.6.2, the Permittee shall maintain records of the metal throughput to the Pinlift shakeout system (unit 9A).

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.6.6 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.6.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.7

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Tumbleblast shotblaster, constructed in November, 1965, identified as unit 3, with a maximum capacity of 12.5 tons of iron castings per hour, using a 6300 acfm baghouse identified as CE-4 as emissions control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.7.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Tumbleblast shotblaster shall not exceed 0.030 grains per dry standard cubic foot of exhaust air and 5.0 tons per year.

#### D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-4 controlling this facility.

### Compliance Determination Requirements

#### D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Tumbleblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.7.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.7.4 Particulate Matter (PM)

The baghouse CE-4 for PM control shall be in operation at all times when the Tumbleblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.7.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-4 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.7.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-4 used in conjunction with the Tumbleblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure

drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### **D.7.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the Tumbleblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.7.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.7.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-4 stack exhaust.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.7.7, the Permittee shall maintain records of the results of the inspections required under Condition D.7.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.8 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Tableblast shotblaster, constructed in July, 1967, identified as unit 4, with a maximum capacity of 3.0 tons of iron castings per hour, using a 4500 acfm baghouse identified as CE-2 as control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.8.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Tableblast shotblaster shall not exceed 0.037 grains per dry standard cubic foot of exhaust air and 4.3 tons per year.

#### D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-2 controlling this facility.

### Compliance Determination Requirements

#### D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Tableblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.8.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.8.4 Particulate Matter (PM)

The baghouse CE-2 for PM control shall be in operation at all times when the Tableblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.8.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-2 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.8.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-2 used in conjunction with the Tableblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range

established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### **D.8.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the Tableblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.8.8 Broken or Failed Bag Detection**

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In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.8.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.8.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-2 stack exhaust.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (e) To document compliance with Condition D.8.7, the Permittee shall maintain records of the results of the inspections required under Condition D.8.7 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## SECTION D.9 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Spinnerblast shotblaster, constructed in 1979, identified as unit 7, with a maximum capacity of 1.5 tons of iron castings per hour, using a 4500 acfm baghouse identified as CE-3 as control.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.9.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the Spinnerblast shotblaster shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouse CE-3 controlling this facility.

### Compliance Determination Requirements

#### D.9.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 180 days after the issuance of this permit, the Permittee shall perform PM testing of the Spinnerblast shotblaster, using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.9.1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.9.4 Particulate Matter (PM)

The baghouse CE-3 for PM control shall be in operation at all times when the Spinnerblast shotblaster is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.9.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse CE-3 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.9.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-3 used in conjunction with the Spinnerblast shotblaster, at least once daily when the shotblaster is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain

troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.9.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Spinnerblast shotblaster when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.9.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.9.9 Record Keeping Requirements

- (a) To document compliance with Condition D.9.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-3 stack exhaust.
- (b) To document compliance with Condition D.9.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Documentation of the dates vents are redirected.
- (g) To document compliance with Condition D.9.7, the Permittee shall maintain records of the results of the inspections required under Condition D.9.7 and the dates the vents are redirected.
- (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.10 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) muller green sand handling system, including two sand storage bins, each with a capacity of 150 tons, identified as unit 5, constructed in August 1976, with a maximum capacity of 60 tons of sand per hour, with emissions controlled by a wet scrubber, identified as CE-1B.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.10.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the muller green sand handling system shall not exceed 0.074 grains per dry standard cubic foot of exhaust air and 19.0 tons per year.

#### D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wet scrubber CE-1B controlling this facility.

### Compliance Determination Requirements

#### D.10.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 24 months after issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.10.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.10.4 Particulate Matter (PM)

The wet scrubber CE-1B for PM control shall be in operation at all times when the muller green sand handling system is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.10.5 Visible Emissions Notations

- (a) Daily visible emission notations of the wet scrubber CE-1B stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.10.6 Scrubber Parametric Monitoring

The Permittee shall monitor and record the pressure drop and flow rate of the scrubber CE-1B, at least once per shift. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the wet scrubber shall be maintained within the range of 4 to 9.5 inches of water or a range established during the latest stack test. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rates shall be maintained at a minimum of 75 gallons per minute or minimum

flow rates established during the latest stack test. The Compliance Response Plan for the scrubber shall contain troubleshooting contingency and response steps for when the pressure drop or flow rate readings are outside of the normal ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. The instrument used for determining the flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

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#### D.10.7 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubber controlling the miller green sand handling system when venting to the atmosphere. All defective scrubber parts shall be replaced.

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#### D.10.8 Scrubber Failure

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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#### D.10.9 Record Keeping Requirements

- (a) To document compliance with Condition D.10.5, the Permittee shall maintain records of daily visible emission notations of the wet scrubber CE-1B stack exhausts.
- (b) To document compliance with Condition D.10.6, the Permittee shall maintain records of the pressure drop readings and flow rate readings of each of the scrubbers.
- (c) To document compliance with Condition D.10.7, the Permittee shall maintain records of the results of the inspections required under Condition D.10.7 and the types and numbers of any parts replaced.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.11

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) oil/shell core sand handling system, including two silos each with a capacity of 25 tons of sand, identified as unit 10A, constructed in 1977, with a maximum capacity of 2.11 tons of sand per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.11.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the oil/shell core sand handling system shall not exceed 0.052 grains per dry standard cubic foot of exhaust air and 5.0 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the oil/shell core sand handling system shall be limited to 2803.2 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.11.3 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain records of the sand throughput to the oil/shell core sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.11.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.12 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) no-bake sand handling system, identified as unit 10, located in the south yard, constructed prior to 1970, with a maximum capacity of 1.25 tons of sand per hour, with emissions uncontrolled, and consisting of the following emission units:

- (a) one (1) pneumatic air driven silo with a maximum capacity of 75 tons of sand; and
- (b) one (1) sand hopper with a maximum capacity of 15 tons of sand.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.12.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the no-bake sand handling system shall not exceed 0.027 grains per dry standard cubic foot of exhaust air and 14.6 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the no-bake sand handling system shall be limited to 8103 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.12.3 Record Keeping Requirements

- (a) To document compliance with Condition D.12.1, the Permittee shall maintain records of the sand throughput to the no-bake sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.12.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.12.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.13

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

one (1) Alphaset sand handling system, including one silo with a capacity of 50 tons of sand and one (1) storage hopper with a capacity of 10 tons, identified as unit 10B, constructed in 1976, with a maximum capacity of 5.0 tons of sand per hour, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.13.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the alphaset sand handling system shall not exceed 0.021 grains per dry standard cubic foot of exhaust air and 5.6 tons per year. In order to comply with these emissions limits, the amount of sand throughput to the alphaset sand handling system shall be limited to 3109.8 tons per 12 consecutive month period.

### Compliance Determination Requirements

#### D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.13.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.13.3 Record Keeping Requirements

- (a) To document compliance with Condition D.13.1, the Permittee shall maintain records of the sand throughput to the alphaset sand handling system.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.13.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.13.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.14 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

one (1) magnesium treatment process for producing ductile iron, identified as unit number 22, constructed in 1977, with a maximum capacity of 6.0 tons of iron per hour, with emissions controlled with the use of the Sigmat process. The Sigmat process is essentially a box enclosure which holds the magnesium. The iron is poured into the box to react with the magnesium and smoke is unable to escape.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.14.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]**

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from the magnesium treatment process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

#### **D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the sigmat process controlling this facility.

### **Compliance Determination Requirements**

#### **D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing if it is necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.



## SECTION D.15 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities including the following:

- (a) six (6) snag grinders, constructed in 1970, identified as units 2A through 2D, using a 20,535 acfm baghouse identified as CE-5 for emissions control;
- (b) nine (9) portable grinders, constructed in 1960, identified as units 2E through 2K, with emissions uncontrolled; and
- (c) one (1) welding/grinding station, constructed in 1960, identified as unit 2L, with emissions uncontrolled.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.15.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-18]

Pursuant to 326 IAC 6-1-18 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each of the above listed processes shall not exceed 0.023 grains per dry standard cubic foot of exhaust air and 3.0 tons per year.

### Compliance Determination Requirements

#### D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing if it is necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.15.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>South Bend Acquisition Corporation</b>
<b>Source Location:</b>	<b>220 W. Eckman Street, South Bend, Indiana 46601</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3321</b>
<b>Operation Permit No.:</b>	<b>T141-6210-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>February 18, 1999</b>
<b>Permit Modification No.:</b>	<b>T141-11175-00010</b>
<b>Permit Reviewer:</b>	<b>Nisha Sizemore</b>

The Office of Air Management (OAM) has reviewed a Part 70 Permit appeal from South Bend Acquisition Corporation relating to the operation of a gray and ductile iron foundry.

#### History

On March 8, 1999, South Bend Acquisition Corporation timely appealed for administrative review of the Part 70 Permit. The permit shall be amended as follows (language deleted is shown with a line through it, language added is shown in bold):

- (1) The requirements to have preventive maintenance plans for all of the processes without pollution control devices have been deleted since there is no preventive maintenance which could be done for these facilities which would affect emissions. All of the following conditions in those sections have been renumbered accordingly.

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.~~

~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.~~

~~D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.11.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.12.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.13.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

---

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

- (2) The requirements to have preventive maintenance plans have been revised to state that the preventive maintenance plans are only required for the control device, not for the facility, because there is no preventive maintenance which could be done to the facility itself which would affect emissions.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the north cyclone and the wet scrubber CE-1A controlling** this facility.

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-4 controlling** this facility.

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-2 controlling** this facility.

D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-3 controlling** this facility.

D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the wet scrubber CE-1B controlling** this facility.

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the sigmat process controlling** this facility.

- (3) B.12 (Preventive Maintenance Plan) paragraph (b) and (c) have been revised.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance failure to implement the Preventive Maintenance Plan~~ does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

- (4) C.21 (General Record Keeping Requirements)(c)(4) has been modified to match B.12

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (5) The conditions D.1.2, D.4.2, D.11.2, D.12.2, D.13.2, D.14.3, and D.15.2 have been changed as follows:

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

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The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.13.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.15.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

- (6) Conditions D.5.8 and D.10.8 have been revised to contain a provision for the wet scrubbers to operate during failure under emergency conditions.

**D.5.8 Scrubber Failure**

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In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**D.10.8 Scrubber Failure**

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In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (7) Conditions D.7.8, D.8.8, and D.9.8, regarding baghouse failure have been revised as follows:

#### D.7.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.8.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.9.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan

shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (8) Conditions D.7.9(b)(3)-(7), D.8.9(b)(3)-(7), and D.9.9(b)(3)-(7) have been deleted.

#### D.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-4 stack exhaust.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) Documentation of the dates vents are redirected.

#### D.8.9 Record Keeping Requirements

- (a) To document compliance with Condition D.8.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-2 stack exhaust.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.

- (2) Documentation of all response steps implemented, per event .
- (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
- (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
- (5) ~~Operator standard operating procedures (SOP).~~
- (6) ~~Manufacturer's specifications or its equivalent.~~
- (7) ~~Equipment "troubleshooting" contingency plan.~~
- (8) Documentation of the dates vents are redirected.

#### D.9.9 Record Keeping Requirements

- (a) To document compliance with Condition D.9.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-3 stack exhaust.
- (b) To document compliance with Condition D.9.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) Documentation of the dates vents are redirected.

#### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The appeal was filed on March 8, 1999.





## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>South Bend Acquisition Corporation</b>
<b>Source Location:</b>	<b>220 W. Eckman Street, South Bend, Indiana 46601</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3321</b>
<b>Operation Permit No.:</b>	<b>T141-6210-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>February 18, 1999</b>
<b>Permit Modification No.:</b>	<b>T141-11175-00010</b>
<b>Permit Reviewer:</b>	<b>Nisha Sizemore</b>

The Office of Air Management (OAM) has reviewed a Part 70 Permit appeal from South Bend Acquisition Corporation relating to the operation of a gray and ductile iron foundry.

#### History

On March 8, 1999, South Bend Acquisition Corporation timely appealed for administrative review of the Part 70 Permit. The permit shall be amended as follows (language deleted is shown with a line through it, language added is shown in bold):

- (1) The requirements to have preventive maintenance plans for all of the processes without pollution control devices have been deleted since there is no preventive maintenance which could be done for these facilities which would affect emissions. All of the following conditions in those sections have been renumbered accordingly.

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.~~

~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.~~

~~D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

~~D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

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~~D.11.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

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~~D.12.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

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~~D.13.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.~~

- (2) The requirements to have preventive maintenance plans have been revised to state that the preventive maintenance plans are only required for the control device, not for the facility, because there is no preventive maintenance which could be done to the facility itself which would affect emissions.

---

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the north cyclone and the wet scrubber CE-1A controlling** this facility.

---

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-4 controlling** this facility.

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D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-2 controlling** this facility.

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D.9.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the baghouse CE-3 controlling** this facility.

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D.10.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the wet scrubber CE-1B controlling** this facility.

---

D.14.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the sigmat process controlling** this facility.

- (3) B.12 (Preventive Maintenance Plan) paragraph (b) and (c) have been revised.

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B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance failure to implement the Preventive Maintenance Plan~~ does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

- (4) C.21 (General Record Keeping Requirements)(c)(4) has been modified to match B.12

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (5) The conditions D.1.2, D.4.2, D.11.2, D.12.2, D.13.2, D.14.3, and D.15.2 have been changed as follows:

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

---

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

---

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

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The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

---

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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**D.13.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.13.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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**D.14.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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**D.15.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test these facilities by this permit. However IDEM may require compliance testing ~~at any specific time when~~ **if it is** necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.15.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

- (6) Conditions D.5.8 and D.10.8 have been revised to contain a provision for the wet scrubbers to operate during failure under emergency conditions.

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**D.5.8 Scrubber Failure**

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

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**D.10.8 Scrubber Failure**

In the event that scrubber failure has been observed:

- (a) The affected process will be shut down immediately until the failed unit has been replaced. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (7) Conditions D.7.8, D.8.8, and D.9.8, regarding baghouse failure have been revised as follows:

#### D.7.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.8.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall ~~be devised within eight (8) hours of discovery of the failure and shall~~ include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.9.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Within eight (8) hours of the determination of failure, response~~ **Response** steps according to the timetable described in the Compliance Response Plan

shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(8) Conditions D.7.9(b)(3)-(7), D.8.9(b)(3)-(7), and D.9.9(b)(3)-(7) have been deleted.

#### D.7.9 Record Keeping Requirements

- (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-4 stack exhaust.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) Documentation of the dates vents are redirected.

#### D.8.9 Record Keeping Requirements

- (a) To document compliance with Condition D.8.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-2 stack exhaust.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.

- (2) Documentation of all response steps implemented, per event .
- (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
- (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
- (5) ~~Operator standard operating procedures (SOP).~~
- (6) ~~Manufacturer's specifications or its equivalent.~~
- (7) ~~Equipment "troubleshooting" contingency plan.~~
- (8) Documentation of the dates vents are redirected.

#### D.9.9 Record Keeping Requirements

- (a) To document compliance with Condition D.9.5, the Permittee shall maintain records of daily visible emission notations of the baghouse CE-3 stack exhaust.
- (b) To document compliance with Condition D.9.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) ~~Operation and Compliance Response logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) Documentation of the dates vents are redirected.

#### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The appeal was filed on March 8, 1999.



